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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD,

Plaintiff,

v.

AMIS INTEGRITY S.A., WISDOM MARINE
LINES, S.A., and WISDOM MARINE LINES
CO. LTD. *in personam* and M/V AMIS
INTEGRITY (IMO 9732412) her engines,
freights, apparel, appurtenances, tackle, etc., *in*
rem,

Defendants.

Case No. 3:19-cv-01671-BR

IN ADMIRALTY

DECLARATION OF MARKUS OBERG
IN SUPPORT OF DEFENDANT'S
MOTION FOR ADDITIONAL COUNTER
SECURITY

I, MARKUS OBERG, declare as follows:

1. I am over the age of majority and, except as otherwise indicated, make this declaration on personal knowledge, and am competent to testify regarding the facts contained herein.

2. I am one of the attorneys representing Amis Integrity, S.A. in the above-
DECLARATION OF OBERG IN SUPPORT OF
MOTION FOR ADDITIONAL COUNTER SECURITY - Page 1
[Case No. 3:19-cv-01671-BR]

captioned matter.

3. Attached hereto as **Exhibit A** is a true and correct copy of an invoice, dated August 4, 2020, I received from International Sureties, Ltd. for the renewal of the \$2.5 million bond Defendant obtained to obtain the release of the M/V AMIS INTEGRITY in this action. I was later advised that invoice had been paid.

4. Since the Court's February 11, 2020 Order Granting Defendant's Motion for Counter Security, Defendant has incurred additional attorney's fees and costs of nearly \$50,000 to defend Plaintiff's claims raised in this action.

5. Attached hereto as **Exhibit B** is a true and correct copy of a Claim Assignment Agreement ("Assignment") entered into with GP Global APAC Pte. Ltd. and GP Global ARA BV (collectively, "GP Global") for the release of GP Global's claims against Plaintiff Dry Bulk Singapore Pte Ltd. for unpaid bunker fuel provided by GP Global to the M/V AMIS INTEGRITY. Copies of GP Global's invoices, No. SPI190305/IB/SG and No. SIP-19-07-199-NL, are attached as Exhibits 1 and 2 to the Assignment. As set forth in the Assignment, the totals sum of GP Global's assigned claims was \$383,257.03 and interest accrued thereon.

6. Attached hereto as **Exhibit C** is a true and correct copy of the General Terms of Sale of Bunker Fuel by BP Global ARA B.V. that I received from GP Global's attorney.

7. Attached hereto as **Exhibit D** is a true and correct copy of an email, dated August 18, 2020, from GP Global's counsel threatening to arrest the Vessel in Recalada, Argentina that was forwarded to me.

8. Attached hereto as **Exhibit E** is a true and correct copy of a WhatsApp conversation between Stavros Tsolakis and Thomas Rolin that was produced by Plaintiff as DB – 000140 during the course of discovery.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF OREGON AND THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

DATED this 9th day of October, 2020 signed at Seattle, Washington.

s/ Markus B.G. Oberg
Markus B. G. Oberg

CERTIFICATE OF SERVICE

I hereby certify that on October 9, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all associated counsel.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed at Seattle, Washington this 9th day of October, 2020.

s/ Shelley Courter

Shelley Courter, Legal Assistant

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